

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION AT CINCINNATI**

TAMERA BROWN, et al.,

Plaintiff,

v.

CITY OF CINCINNATI, et al.,

Defendants.

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CASE NO: 1:18-CV-412

JUDGE: SUSAN J. DLOTT

MAGISTRATE KAREN L. LITKOVITZ

**DEFENDANTS' MOTION TO MODIFY
SCHEDULING ORDER**

Now come Defendants, through counsel, and request that the Court enter a modified scheduling order. Plaintiffs produced documents responsive to Defendant's December 3, 2018 discovery demand on June 7 and June 12. Since the last phone conference with the Court on March 20, 2019, Defendants now have conflicts that render Defendants unable to meet the Court's current deadlines. This extension is not sought to delay the litigation.

Plaintiffs are represented by two different firms. Attorney Thumann does not object to the extension. Defendants attempted but did not receive a response from the other Plaintiffs' counsel. Defendants' counsel believes Attorney Thumann's position is that of all Plaintiffs' counsel but to be candid with the Court, Defendants were unable to obtain that clarification prior to filing this Motion.

The parties are in agreement to extend the deadlines and respectfully request an extension of the scheduling order as follows:

Defendants' Answer:	August 31, 2019
Defendants' Motions for Judgment on the Pleadings:	September 30, 2019
Plaintiff's Response:	November 1, 2018
Defendants' Reply:	November 18, 2019

Respectfully Submitted,

/s/ Janaya Trotter Bratton

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Trial Attorneys for City Defendants

CERTIFICATE OF SERVICE

I hereby certify that on June 26, 2019, a copy of the foregoing pleading was filed electronically. Notice of this filing will be sent to all parties for whom counsel has entered an appearance by operation of the Court's electronic filing system. Parties may access this filing through the Court's system. I further certify that a copy of the foregoing pleading and the Notice of Electronic Filing has been served by ordinary U.S. mail upon all parties for whom counsel has not yet entered an appearance electronically.

s/ Janaya Trotter Bratton

Janaya Trotter Bratton